

Exhibit A:
Plaintiffs' Proposal

Plaintiffs have provided Google with the domains represented in the infringement notices Plaintiffs sent to Google through December 12, 2024. Google will identify the Merchant Center Account(s) associated with those domains, a process Google describes as “relatively easy” and “not burdensome.” Hr’g. Tr. 32:17–20 (Dec. 5, 2024) (Dkt. 57).

Plaintiffs propose that Google then perform two searches.

1. **Umbrella Accounts:** All Shopping Ads merchants have a Merchant Center Account. [Link](#). To use *paid* Shopping Ads, a merchant must also have a Google Ads Account and link it to her Merchant Center Account. [Link](#). Some merchants may also use manager accounts and sub-accounts to link multiple Merchant Center Accounts and/or Google Ads Accounts. *See My Client Center Accounts* ([Link](#)), *Multi-Client Accounts* ([Link](#)), *Subaccounts* ([Link](#)). Thus, for many merchants, the Merchant Center functions as a kind of “umbrella account,” with one or more other accounts linked to it. For each domain Plaintiffs have noticed (i.e., the domains Plaintiffs have now provided to Google), Google will identify the Merchant Center Account(s) associated with the domain, as set for above, and identify any other accounts used for Shopping Ads linked to it, e.g., linked Merchant Center Accounts or Google Ads Accounts.
2. **Email, Payment Information, Phone Number:** Google will identify any additional Shopping Ads accounts that share any of three field values with one of the accounts identified No. 1 above: email address (primary email and recovery email), payment information (either a financial account or an address for invoicing), and phone number.

In the event that a particular account, email address, phone number, or piece of payment information generates a significantly greater number of results than others, Google can request that the parties meet and confer to determine whether an alternative approach should be used for that particular value.

The above is without prejudice to Plaintiffs requesting additional information based on documents Google produces or arguments Google advances.